

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CITY OF OMAHA POLICE AND FIRE
RETIREMENT SYSTEM and CITY OF
BRISTOL PENSION FUND, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

JUNIPER NETWORKS, INC., SCOTT G.
KRIENS, KEVIN R. JOHNSON and ROBYN
M. DENHOLM,

Defendants.

No.: 5:11-cv-04003-LHK

Before: Hon. Lucy H. Koh

STIPULATION AND ~~Proposed~~ ORDER

Pursuant to Local Rule 6-2, the parties to the above-captioned action hereby stipulate to extend the briefing schedule for Defendants' motion to dismiss by one week. The current briefing schedule is as follows:

Plaintiffs' Brief in Opposition: **October 15, 2012**

Defendants' Replies: **November 1, 2012**

The parties respectfully propose the following briefing schedule:

Plaintiffs' Brief in Opposition: **October 22, 2012**

Defendants' Replies: **November 8, 2012**

SO STIPULATED

/s/ Thomas L. Laughlin IV

Thomas L. Laughlin IV

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/s/ Joni Ostler

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Attorney for Defendants

Pursuant to Local Rule 6-2, this stipulation is supported by the following Declaration of Thomas Laughlin.

DECLARATION OF THOMAS LAUGHLIN

I, Thomas Laughlin, declare:

1. I am an attorney at Scott+Scott LLP, counsel for Plaintiffs in this action. I have the principal responsibility for preparing Plaintiffs' brief in opposition to Defendants' motion to dismiss. I make this declaration in support of the parties' stipulation to extend the briefing schedule for Defendants' motion to dismiss by one week.

2. This is the first request for an extension of time of the briefing schedule for Defendants' motion to dismiss.

3. The parties have stipulated to this extension at my request. Although I have acted with due diligence, several other matters have required my immediate attention in recent weeks, including ongoing discovery in a case in the Eastern District of Michigan, ongoing discovery in a case in the District of Maine and an unexpected motion in a case pending in the Southern District of New York.

4. The hearing on Defendants' motion to dismiss is scheduled for January 31, 2013. Therefore, it does not appear that the requested extension will impact the schedule in this case.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on October
2 11, 2012 at New York, New York.

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4 /s/ Thomas L. Laughlin IV
Thomas L. Laughlin IV

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7 SO ORDERED:

8 DATE: October 12, 2012

9 
Hon. Lucy H. Koh
United States District Judge

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12 **CERTIFICATE OF SERVICE**

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14 I, Thomas Laughlin, am the ECF user whose identification and password are being used
15 to file the foregoing Stipulation and [Proposed] Order. In compliance with General Order
16 45.X.B, I hereby attest that Joni Ostler has concurred in this filing.

17 Dated: October 11, 2012

18 /s/ Thomas L. Laughlin IV
Thomas L. Laughlin IV
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